

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:18-CV-68
)	
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
Defendants,)	
)	
KARLA PEREZ, <i>et al.</i> ,)	
)	
Defendant-Intervenors,)	
and)	
)	
STATE OF NEW JERSEY,)	
)	
Defendant-Intervenor.)	

**DEFENDANT-INTERVENOR STATE OF NEW JERSEY’S UNOPPOSED MOTION
TO EXCEED PAGE LIMIT**

Defendant-Intervenor State of New Jersey (New Jersey) respectfully requests that the Court grant it permission to exceed the 20-page limit for memoranda of law by 28 pages for its Opposition to Plaintiffs’ Motion for Summary Judgment. Plaintiffs made a similar Motion for Leave to File Excess Pages, which was granted (Dkt. 485, Dkt. 488), and on October 9, 2020, Plaintiffs filed a 47-page memorandum in support of their Motion for Summary Judgment (Dkt. 486). New Jersey’s memorandum of law in opposition will address complex issues in a case of national importance, and New Jersey requires the additional pages to adequately present these issues to the Court for adjudication. New Jersey seeks this extension for good cause and in the interest of justice, and no party will be prejudiced if the motion is granted.

Counsel for Plaintiffs, Federal Defendants, and the Perez Defendant-Intervenors have each indicated that they do not oppose this request.

CONCLUSION

New Jersey respectfully request that the Court grant this motion for leave to exceed page limits.

Dated: November 6, 2020

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Mayur P. Saxena
MAYUR P. SAXENA
Attorney-in-Charge
Assistant Attorney General
(admitted pro hac vice)
124 Halsey St., 5th Floor
Newark, New Jersey 07101
PO Box 45029-5029
Phone: (973) 648-3283
Fax: (973) 648-4887
Mayur.Saxena@law.njoag.gov

Melissa Medoway, Deputy Attorney General
(admitted pro hac vice)
Eric L. Apar, Deputy Attorney General
(admitted pro hac vice)
Elspeth Faiman Hans,
Deputy Attorney General
(admitted pro hac vice)
Tim Sheehan, Deputy Attorney General
(admitted pro hac vice)
*Attorneys for Defendant-Intervenor State of
New Jersey*

CERTIFICATE OF SERVICE

I certify that on November 6, 2020, I caused this document (and a proposed order) to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Mayur P. Saxena
Mayur P. Saxena

CERTIFICATE OF CONFERENCE

I certify that on November 5, 2020, I emailed Todd Disher, counsel for Plaintiffs, Nina Perales, counsel for Perez Defendant-Intervenors, and Jeffrey Robins, counsel for Federal Defendants to confer on the motion to exceed page limits. Counsel have consented to this request.

/s/ Mayur P. Saxena
Mayur P. Saxena

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**ORDER GRANTING DEFENDANT-INTERVENOR NEW JERSEY’S MOTION TO
EXCEED PAGE LIMIT**

On this date, the Court considered Defendant-Intervenor New Jersey’s (New Jersey) Motion for Leave to Exceed Page Limit for its Opposition to Plaintiffs Motion for Summary Judgment. After considering the Motion, the Court believes the Motion is meritorious and should be granted.

IT IS THEREFORE ORDERED that New Jersey’s Motion for Leave to Exceed Page Limit for their Opposition to Plaintiffs’ Motion for Summary Judgment is hereby GRANTED. New Jersey has leave to file an Opposition brief that does not exceed 48 pages.

SIGNED on this the _____ day of _____, 2020.

Hon. Andrew S. Hanen,
U.S. District Court Judge